

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,
AND ZHEJIANG BETA PHARMA
CO., LTD.,
Defendants.

Civil Action No. 3:14-cv-01790-VLB

DECEMBER 4, 2014

AFFIDAVIT OF DON ZHANG

The undersigned, being duly sworn, deposes and says:

1. I am above eighteen years of age and believe in the obligations of an oath.
2. I am the CEO, president, and shareholder of Beta Pharma, Inc. ("Beta Pharma").
3. I have personal knowledge of the facts set forth in this Affidavit, and they are true and accurate to the best of my knowledge and belief.
4. Beta Pharma is a Delaware corporation, which has corporate offices and a principal place of business at 5 Vaughn Drive, Suite 106, Princeton, New Jersey 08540.
5. I permanently reside in Plainsboro, New Jersey, and I work at Beta Pharma's Princeton office.

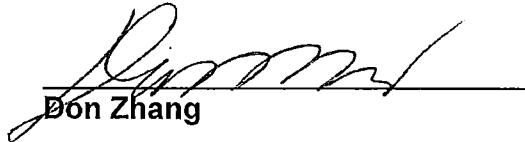
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6. Beta Pharma also has a research facility in Monmouth Junction, New Jersey.

7. In November 2011, Beta Pharma moved its offices from Connecticut to Princeton, New Jersey.

8. Since November 2011, all of Beta Pharma's computers, and nearly all of its documents, have been located in New Jersey.

9. Since November 2011, all of Beta Pharma's employees have worked in New Jersey.


Don Zhang

STATE OF NEW JERSEY)

) ss.: December 4, 2014

COUNTY OF MERCER)

Before me personally appeared Don Zhang, signer of the foregoing instrument, and he acknowledged the same to be his free act and deed, for the purposes contained herein.

GARY J. WOOD
Commission # 2402597
Notary Public, State of New Jersey
My Commission Expires
November 24, 2015

Notary Public

My commission expires November 24, 2015